

June 27, 2022

Our File No.: 211828

Via Email: etcc@toronto.ca

Etobicoke York Community Council
Toronto City Hall
2nd Floor, West Tower
100 Queen Street West
Toronto, ON M5H 2N2

Attention: Nancy Martins

Dear Sirs/Mesdames:

**Re: Item 33.11 – Mount Dennis Secondary Plan – Final Report
25 Photography Drive**

We are solicitors for CP REIT Ontario Properties Limited in respect of the property known municipally in the City of Toronto as 25 Photography Drive (the “**Property**”). We are writing on behalf of our client to provide comments regarding the Picture Mount Dennis Framework and draft Mount Dennis Secondary Plan (the “**Draft Secondary Plan**”). Our client has concerns with the Draft Secondary Plan and would respectfully request that revisions be made or the Property be exempted from the Draft Secondary Plan.

Background

On July 19, 2021, our client submitted official plan amendment and rezoning applications in respect of the Property. The City declared the applications complete as of September 16, 2021. Discussions with City staff are ongoing regarding these applications.

Draft Secondary Plan

While aspects of the Draft Secondary Plan appear to respond appropriately to the applications filed in respect of the Property, our client is concerned that certain aspects of the Draft Secondary Plan would negatively impact optimal redevelopment of the Property.

In particular:

- Land Use – Non-Residential: Section 5.3 would require residential intensification to be combined with non-residential uses on lands designated as *Mixed Use Areas*. Section 5.4.1

would require the replacement of all existing non-residential gross floor area (through a variety of mechanisms). Our client is concerned that these policies go further than the land use permissions for *Mixed Use Areas* and would preclude otherwise appropriate redevelopment in the area and on the Property.

- Parkland: Section 6.9 and Map 5 identify locations for potential new public parks and open spaces. Our client has concerns with a park being located on the Property.
- Built Form – Building Type: Section 8.14.3 refers to 4-storey base buildings and tower stepbacks of 5 metres or greater, with the potential for an additional stepback above the second storey along Weston Road. Section 8.48.3 indicates base buildings should have maximum heights between 4 and 6 storeys on certain streets. Our client believes that higher base buildings, with reduced stepbacks, are appropriate as part of the redevelopment of the Property. The height of such base buildings is better determined through a site-specific approach to the above-noted applications.
- Built Form – Tower Floor Plates: Section 8.14.4 would propose a general maximum floor plate of 750 square metres. The Tall Building Guidelines should continue to be used to address matters related to floor plate size.
- Built Form – Tower Separation: Section 8.14.5 would require a minimum tower separation of 30 metres, except in limited circumstances. Again, the Tall Building Guidelines should continue to be used to address matters related to tower separation to ensure appropriate flexibility.
- Built Form – Tall Building Locations: Section 8.48.1 would located the tallest building heights within the area of the Draft Secondary Plan (maximum height of 45-storeys) on lands adjacent to Eglinton Avenue West, closest to the Mount Dennis Station, with Section 8.48.2 indicating a transition down to 35 storeys towards the intersection of Black Creek Drive and Eglinton Avenue West. Our client believes that the Property is an appropriate location for greater height, with those heights to be determined through a site-specific approach to the above-noted applications.
- Housing: Section 9.7 should be amended in accordance with the policy direction for unit mix in the approved Downtown Plan and Midtown Plan.
- Urban Design Guidelines: The Draft Secondary Plan would cross-reference urban design guidelines that have not yet been released with sufficient opportunity for comment and feedback. This policy should be deleted.

We would also appreciate if this letter could service as our request for notice of any decision made in respect of this matter.

Yours truly,

Goodmans LLP



David Bronskill

DJB/